

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**L.B., a minor, who sues through his mother )  
and )  
Next friend, Veronica Stanley, and )  
VERONICA STANLEY, individually, )**

**Plaintiff,**

**v.**

**BULLOCK COUNTY BOARD OF )  
EDUCATION and ROBERT MCDUFFIE, )  
in his individual capacity,**

**CIVIL ACTION NO. 2:07-CV-681-WHA**

**Defendants.**

**PLAINTIFFS' REQUEST FOR ADMISSIONS TO DEFENDANTS**

Pursuant to Fed. R. Civ. P. 36, Plaintiffs, request that Defendants, Robert McDuffie and

Bullock County Board of Education admit the following facts:

1. A substitute teacher was not obtained for the agriculture class at Bullock County Career Technical Center, taught by Mr. Hugley, until after LB was injured on April 5, 2006.
2. Mr. Hugley was absent from school April 3, 4, and 5 of 2006 for jury duty.
3. Robert McDuffie received a call from his mother-in-law at the Bullock County Career Technical Center on the morning of April 5, 2006, after the school day

had begun, informing him that she had locked her keys in her car and needed him to come bring her keys.

4. Derean Jackson had a reputation for fighting and intimidating other students at the Bullock County Career Center when he was a student at the center in 2006.

5. Derean Jackson was suspended on more than one occasion for fighting when he was a student at the Bullock County Career Center.

6. Robert McDuffie did not know that LB had gone to the hospital for injuries he sustained in McDuffie's classroom until the afternoon of April 5, 2006.

7. Robert McDuffie did not know that Maurice Fields, a student in the same shop class as LB, had gone to the hospital for injuries sustained in his classroom until the afternoon of April 5, 2006.

8. Robert McDuffie has left some students in his 8:30 AM shop class at the Bullock County Career Center, unsupervised, with permission from Mr. Cook, Director, while he took other students from the class to work on projects at the highschool .

9. On April 5, 2006, when Robert McDuffie received a telephone call from his mother-in-law, he intended to leave students in his classroom at the Bullock County Career Center unsupervised to go help his mother-in-law, who was locked out of her car.

10. Video cameras are installed in Robert McDuffie's classroom .

11. Derean Jackson was in a fight at the Bullock County Career Center on March 3, 2008, and was suspended for three days.

Submitted this 9<sup>th</sup> day of July, 2008.

/s/ Kathryn Dickey

Kathryn Dickey (DIC025)

Attorney for Plaintiffs

OF COUNSEL:  
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**CERTIFICATE OF SERVICE**

I certify that I have served a copy of the forgoing on the following counsel of record by placing same in the United States Mail, properly addressed and first class postage prepaid on this 9<sup>th</sup> day of July 2008.

Honorable Clay R. Carr  
Honorable Mark S. Boardman  
Boardman, Carr, Hutcheson, P.C.  
400 Boardman Drive  
Chelsea, AL 35043

/s/ Kathryn Dickey  
OF COUNSEL